

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NEERAJ KUMAR, *et al.*,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES,

Defendant.

Case No. 2:25-cv-00457-JHC

STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND ORDER

For good cause, Plaintiffs and Defendant, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until June 16, 2025. Plaintiffs brought this litigation pursuant to the Administrative Procedure Act seeking, *inter alia*, to compel U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate their Forms I-526Es, Immigrant Petition by Regional Center Investor, and Forms I-485s, Applications to Register Permanent Residence or Adjust Status. Defendants’ response to the Complaint is currently due on May 16, 2025. The parties are currently working towards a resolution to this litigation.

Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to

1 control the disposition of the causes on its docket with economy of time and effort for itself, for
2 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ. P. 1.

3 With additional time, this case may be resolved without the need of further judicial
4 intervention, or the issues may be narrowed. USCIS has adjudicated all but one of the plaintiffs’
5 Form I-526Es. USCIS has issued Requests for Evidence (“RFE”) for the remaining plaintiff. Once
6 USCIS has received that plaintiff’s response to the RFE, USCIS will review the response and
7 continue with processing. The parties are discussing how to proceed with the litigation concerning
8 Plaintiffs’ Form I-485s and whether resolution is available.

9 Because additional time is necessary, the parties agree that holding this case in abeyance
10 through June 16, 2025, is appropriate. Therefore, the parties believe good cause exists for a stay
11 in these proceedings to save the parties and this Court from spending unnecessary time and judicial
12 resources on this matter.

13 Accordingly, the parties request that the Court hold the case in abeyance until June 16,
14 2025. The parties will submit a joint status report on or before June 16, 2025.

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1 DATED this 9th day of May, 2025.

2 Respectfully submitted,

3 TEAL LUTHY MILLER
Acting United States Attorney

THE GALATI LAW FIRM, LLC

4 s/ Michelle R. Lambert

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10 *Attorneys for Defendants*

s/ Anahita M. George

11 *I certify that this memorandum contains 337*
12 *words, in compliance with the Local Civil Rules.*

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Attorneys for Plaintiff

ORDER

The case is held in abeyance until June 16, 2025. The parties shall submit a status update on or before June 16, 2025. It is so **ORDERED**.

DATED this 12th day of May, 2025.

A handwritten signature in cursive script, reading "John H. Chun", written in black ink over a horizontal line.

JOHN H. CHUN
United States District Judge